

U.S. Department of Justice

United States Attorney District of New Jersey

970 Broad Street Newark, New Jersey 07102 973-645-2700

March 4, 2025

VIA CM/ECF

Honorable Michael E. Farbiarz United States District Judge U.S. Post Office & Federal Courthouse Newark, New Jersey 07102

Re: United States v. Gordon Coburn and Steven Schwartz

Crim. No. 19-120 (MEF)

Dear Judge Farbiarz:

/s/ Paul G. Ream

U.S. Department of Justice

The Government respectfully submits this letter pursuant to the Court's March 4, 2025 order relating to the application of the Speedy Trial Act. *See* ECF No. 961. First, as of today, there are 60 days remaining on the clock under the Speedy Trial Act. *See* ECF Nos. 766 (Government's description of 10 days having run through September 9, 2024), 769 (Aug. 2, 2024 order adjourning trial and excluding time under an ends-of-justice basis until March 3, 2025), 952 (Mar. 4, 2025 order denying Defendant Schwartz's motion in limine number 2, which, as the parties agreed, had been pending through March 4, *see* 18 U.S.C. § 3161(h)(1)(D), (H)). Second, the Government believes that the Speedy Trial clock is currently tolled because of the pending motion before Magistrate Judge Michael A. Hammer filed on March 2, 2025. *See* ECF No. 926 at 2.

With respect to the Court's third request, the United States will provide an update to the Court by tomorrow.

Respectfully submitted,

GLENN S. LEON

Chief

JOHN GIORDANO

United States Attorney

/s/ Keith D. Edelman /s/ Connor Mullin /s/ Rachelle M. Navarro

KEITH D. EDELMAN
CONNOR MULLIN

RACHELLE M. NAVARRO
Assistant United States Attorney

PAUL G. REAM District of New Jersey Fraud Section, Criminal Division